## PICCARRETA DAVIS KEENAN FIDEL PC

2 East Congress Street, Suite 1000

Tucson, Arizona 85701-1782

(520) 622-6900

Michael L. Piccarreta

State Bar No. 003962

Email: mlp@pd-law.com

Attorney for Defendant Andrew Padilla

## IN THE UNITED STATES DISTRICT COURT

## DISTRICT OF ARIZONA

United States of America,	NO. CR-18-00422-06-PHX-SMB
Plaintiff,	DEFENDANT PADILLA'S NOTICE OF JOINDER IN DEFENDANT SPEAR'S
v.	MOTION FOR IMMEDIATE DISCOVERY
	REGARDING THE GOVERNMENT'S
6. Andrew Padilla,	ABUSE OF GRAND JURY AND TRIAL
(Counts 1-51)	SUBPOENAS TO OBTAIN DEFENSE
	LAWYER BANK ACCOUNTS, AND FOR
Defendant.	POTENTIAL SANCTIONS (DOC. 531)

Defendant Andrew Padilla, by and through his undersigned attorney, hereby joins in Defendants Scott Spear's Motion for Immediate Discovery Regarding the Government's Abuse of Grand Jury and Trial Subpoenas to Obtain Defense Lawyer Bank Accounts, and for Potential Sanctions (Doc. 531), and adopts the positions set forth in said motion as if fully set forth herein. Defendant Padilla is in agreement with the arguments made in defendant Spear's motion and the issues raised by defendant Spear apply with equal force to defendant Padilla. Defendant Padilla therefore respectfully requests this Court to grand defendant Spear's motion and order the government to disclose the requested records and information.

1 It is expected that excludable delay under 18 U.S.C. § 3161(h)(1) may 2 occur as a result of this motion or entry of an order based herein. 3 RESPECTFULLY SUBMITTED this 23rd day of April, 2019. 4 5 PICCARRETA DAVIS KEENAN FIDEL PC 6 Michael L. Piccarreta Michael L. Piccarreta 7 Attorney for Defendant Andrew Padilla 8 **CERTIFICATE OF SERVICE** 9 10 I hereby certify that on the 23rd day of April, 2019, I electronically transmitted the foregoing to the Clerk of the Court via the CM/ECF system for filing and 11 transmittal of a Notice of Electronic Filing to the following CM/ECF registrants: 12 Reginald Jones: Reginald.Jones@usdoj.gov 13 Peter S. Kozinets: Peter.Kozinets@usdoj.gov 14 John Kucera: John.Kucera@usdoj.gov Margaret Perlmeter: Margaret.Perlmeter@usdoj.gov 15 Kevin Rapp: Kevin.Rapp@usdoj.gov Andrew Stone: Andrew.Stone@usdoj.gov 16 Thomas Bienert: tbienert@bmkattorneys.com 17 Paul Cambria: pcambira@lglaw.com Robert Corn-Revere: bobcornrevere@dwt.com 18 Bruce Feder: bfeder@federlaw.com 19 James Grant: jimgrant@dwt.com Michael D. Kimerer, mdk@kimerer.com 20 Gary Lincenberg: glincenberg@birdmarella.com 21 22 23 24 25 26 27 28